# ROTA PERMIT ADMINISTRATIVE RECORD ITEM RAMEER TOTAL NUMBER OF PAGES

#### PROJECT MEMORANDUM

DATE:

November 16, 1992

TO:

Joe Depner, Project Manager

FROM:

Nels Cone, Chemist

SUBJECT:

DATA VALIDATION OF ANALYTICAL RESULTS FROM PIER 91

RCRA FACILITY INVESTIGATION, PROJECT 624878, DATA SET #1

On September 17, 1992, soil samples were collected for semivolatile (USEPA Method 8270) and Total Petroleum Hydrocarbon (USEPA Methods 418.1 and 8015) analyses. On September 18, 1992, the samples were submitted to Sound Analytical Services (SAS) of Tacoma, Washington to perform the requested analyses on the following samples:

CP-HA-12-5-5.5, CP-HA-12-6-6.5, CP-HA-11-1.5-2, CP-HA-11-6-6.5

Properly completed chain-of-custody (COC) forms were included, along with documented signatures from field to laboratory receipt. All samples were shown as having been properly iced and received in good condition. All holding times were satisfied per regulatory protocol (National Functional Guidelines for Organic Data Review, USEPA, 1990).

Initial QC documentation consisted of method blank results, surrogate recoveries, and supporting TPH 8015 chromatograms. Required data consistency was demonstrated in all samples tested. Analytical results from this data set indicate elevated levels of analytes in all samples tested. Accordingly, this affected the manner in which the data were reported. Specifically, the elevated product levels in the semivolatile analyses required dilution of the samples to ensure that target analytes were within the instrument calibration range. As a result, the reported detection limits are shown to be elevated. Also, surrogate recoveries were outside normal QC limits due to dilution for required analyses. Regardless, the data quality objectives as defined in Table F-2 of the QAPP are not compromised.

Subsequent QC documentation consisting of raw data, instrument calibration/tuning data, semivolatile analysis chromatograms/mass spectroscopy data, and batch QC data satisfy the quality assurance objectives specified in Part F of the Pier 91 RFI Work Plan. Proper data qualifier flags accompanied analytical results as needed, and their use was consistent with standard USEPA guidelines set forth in regulations mentioned above. This data set can be considered valid for its intended use.

NC/rlk/b41:1904b.mem

USEPA RCRA 3012481

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SPECIALIZING IN INDUSTRIAL & TOXIC WASTE ANALYSIS 4813 PACIFIC HIGHWAY EAST, TACOMA, WASHINGTON 98424 - TELEPHONE (206)922-2310 - FAX (206)922-5047

Report To: Burlington Environmental Date: October 5, 1992

624878 Pier 91

Engineering

Report On: Analysis of Soil

Sample Received on 09-18-92

Lab No.: 27215

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Burlington Environmental Inc. Technical Services

#### ANALYSIS:

Project:

Lab No. 27215-1

IDENTIFICATION:

Client ID: CP-HA-12-5-5.5

Semivolatile Organics Per EPA SW-846 Method 8270 Date Extracted: 9-23-92

Date Analyzed: 9-29-92

CAS No.	Compounds	Concentration ug/kg	PQL
108-95-2 111-44-4 95-57-8 541-73-1 106-46-7 100-51-6 95-50-1 95-48-7 39638-32-9 106-44-5 621-64-7 67-72-1 98-95-3	Phenol bis(2-Chloroethyl) ether 2-Chlorophenol 1,3-Dichlorobenzene 1,4-Dichlorobenzene Benzyl Alcohol 1,2-Dichlorobenzene 2-Methylphenol bis(2-Chloroisopropyl)ether 4-Methylphenol N-Nitroso-Di-N-propylamine Hexachloroethane Nitrobenzene	ug/kg  ND	14,000 14,000 14,000 14,000 27,000 14,000 14,000 14,000 14,000 14,000 14,000
78-59-1 88-75-5 105-67-9 65-85-0 111-91-1 120-83-2 120-82-1 91-20-3 106-47-8 87-68-3 59-50-7	Isophorone 2-Nitrophenol 2,4-Dimethylphenol Benzoic Acid bis(2-Chloroethoxy)methane 2,4-Dichlorophenol 1,2,4-Trichlorobenzene Naphthalene 4-Chloroaniline Hexachlorobutadiene 4-Chloro-3-methylphenol	ND ND ND ND ND ND 21,000 ND ND ND	14,000 14,000 14,000 69,000 14,000 14,000 14,000 27,000 14,000 27,000

ND - Not Detected

Continued . . .

This report is issued solely for the use of the person or company to whom it is addressed. This laboratory accepts responsibility only for the due performance of analysis in accordance with industry acceptable practice. In no event shall Sound Analytical Services, Inc. or its employees be responsible for consequential or special damages in any kind or in any amount.

Burlington Environmental, Engineering

Project: 624878 Page 2 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-1

Client ID: CP-HA-12-5-5.5

EPA Method 8270 Continued			
CAS No.	Compounds	Concentration ug/kg	PQL
91-57-6 77-47-4 88-06-2 95-95-4 91-58-7 88-74-4 131-11-3 208-96-8 606-20-2 99-09-2 83-32-9 51-28-5 100-02-7 132-64-9 121-14-2 84-66-2 7005-72-3 86-73-7 100-01-6 534-52-1 86-30-6 101-55-3 118-74-1 87-86-5 85-01-8 120-12-7	2-Methylnaphthalene Hexachlorocyclopentadiene 2,4,6-Trichlorophenol 2,4,5-Trichlorophenol 2-Chloronaphthalene 2-Nitroaniline Dimethyl phthalate Acenaphthylene 2,6-Dinitrotoluene 3-Nitroaniline Acenaphthene 2,4-Dinitrophenol 4-Nitrophenol Dibenzofuran 2,4-Dinitrotoluene Diethylphthalate 4-Chlorophenyl phenyl ether Fluorene 4-Nitroaniline 4,6-Dinitro-2-methylphenol N-Nitrosodiphenylamine 4-Bromophenyl phenyl ether Hexachlorobenzene Pentachlorophenol Phenanthrene Anthracene	70,000 ND	14,000 14,000
84-74-2	Di-n-butylphthalate	ND	14,000

ND - Not Detected

<sup>\*</sup> Compound was detected but below PQL. Value shown is an estimated quantity.

Burlington Environmental, Engineering

Project: 624878 Page 3 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-1

Client ID: CP-HA-12-5-5.5

EPA Method	8270 Continued		
CAS No.	Compounds	Concentration ug/kg	PQL
206-44-0 129-00-0 85-68-7 91-94-1 56-55-3 218-01-9 117-81-7 117-84-0 205-99-2 207-08-9 50-32-8 193-39-5 53-70-3 191-24-2	Fluoranthene Pyrene Butyl benzyl phthalate 3,3'-Dichlorobenzidine Benzo(a)anthracene Chrysene bis(2-ethylhexyl)phthalate Di-n-octyl phthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	ND *(4,100) ND	14,000 14,000 14,000 27,000 14,000 14,000 14,000 14,000 14,000 14,000 14,000 14,000

ND - Not Detected

PQL - Practical Quantitation Limit - These are the quantitation limits for this sample. This number is based on sample size, matrix and dilution required.

\*Compound was detected but below PQL. Value shown is an estimated quantity.

Results are reported on a dry weight basis.

Semi-Volatile Surrogates

Surrogate	Percent	Control	Limits
Compound	Recovery	Water	Soil
Nitrobenzene - d <sub>5</sub> 2-Fluorobiphenyl p-Terphenyl-d <sub>14</sub> Phenol-d <sub>6</sub> 2-Fluorophenol 2,4,6-Tribromophenol	Diluted Out	35 - 114 43 - 116 33 - 141 10 - 94 21 - 100 10 - 123	23 - 120 30 - 115 18 - 137 24 - 113 25 - 121 19 - 122

Burlington Environmental, Engineering

Project: 624878 Page 4 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-1

Client ID: CP-HA-12-5-5.5

TPH Per EPA Method 418.1 Date Extracted: 9-23-92 Date Analyzed: 9-24-92

Total Petroleum
Hydrocarbons, mg/kg

49,000

TPH Per EPA SW-846 Modified Method 8015 Date Extracted: 9-29-92

Date Analyzed: 9-30-92

Total Petroleum

Fuel Hydrocarbons, mg/kg

48,000 E

TPH as Aged Gas, Diesel, and Heavy Oil

SURROGATE RECOVERY, %

1-chlorooctane X8 o-terphenyl X8

Continued . . . .

This report is issued solely for the use of the person or company to whom it is addressed. This laboratory accepts responsibility only for the due performance of analysis in accordance with industry acceptable practice. In no event shall Sound Analytical Services, Inc. or its employees be responsible for consequential or special damages in any kind or in any amount.

Burlington Environmental, Engineering

Project: 624878 Page 5 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-2

Client ID: CP-HA-12-6-6.5

Semivolatile Organics Per EPA SW-846 Method 8270 Date Extracted: 9-23-92

Date Analyzed: 9-23-92

CAS No.	Compounds	Concentration ug/kg	PQL
108-95-2 111-44-4 95-57-8 541-73-1 106-46-7 100-51-6 95-50-1 95-48-7 39638-32-9 106-44-5	4-Methylphenol	ND	15,000 15,000 15,000 15,000 15,000 15,000 15,000 15,000
621-64-7 67-72-1 98-95-3 78-59-1 88-75-5 105-67-9 65-85-0 111-91-1 120-83-2 120-82-1 91-20-3 106-47-8 87-68-3 59-50-7	N-Nitroso-Di-N-propylamine Hexachloroethane Nitrobenzene Isophorone 2-Nitrophenol 2,4-Dimethylphenol Benzoic Acid bis(2-Chloroethoxy)methane 2,4-Dichlorophenol 1,2,4-Trichlorobenzene Naphthalene 4-Chloroaniline Hexachlorobutadiene 4-Chloro-3-methylphenol	ND ND ND ND ND ND ND ND ND ND ND ND	15,000 15,000 15,000 15,000 15,000 15,000 15,000 15,000 29,000 29,000

ND - Not Detected

Burlington Environmental, Engineering

Project: 624878 Page 6 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-2

Client ID: CP-HA-12-6-6.5

ND - Not Detected

<sup>\*</sup> Compound was detected but below PQL. Value shown is an estimated quantity.

Burlington Environmental, Engineering

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Lab No. 27215-2

EPA Method 8270 Continued

Client ID: CP-HA-12-6-6.5

ND

ND

ND

15,000

15,000

15,000

CAS No.	Compounds	Concentration ug/kg	PQL
206-44-0	Fluoranthene	ND	15,000
129-00-0	Pyrene	ND	15,000
85-68-7	Butyl benzyl phthalate	ND	15,000
91-94-1	3,3'-Dichlorobenzidine	ND	29,000
56-55-3	Benzo(a)anthracene	ND	15,000
218-01-9	Chrysene	ND	15,000
117-81-7	bis(2-ethylhexyl)phthalate	ND	15,000
117-84-0	Di-n-octyl phthalate	ND	15,000
205-99-2	Benzo(b)fluoranthene	ND	15,000
207-08-9	Benzo(k)fluoranthene	ND	15,000
50-32-8	Benzo(a)pyrene	ND	15,000

ND - Not Detected

193-39-5

53-70-3

191-24-2

PQL - Practical Quantitation Limit - These are the quantitation limits for this sample. This number is based on sample size, matrix and dilution required.

Results are reported on a dry weight basis.

Indeno(1,2,3-cd)pyrene

Dibenz(a,h)anthracene

Benzo(q,h,i)perylene

Semi-Volatile Surrogates

Surrogate	Percent	Control	Limits
Compound	Recovery	Water	Soil
Nitrobenzene - d <sub>5</sub> 2-Fluorobiphenyl p-Terphenyl-d <sub>14</sub> Phenol-d <sub>6</sub> 2-Fluorophenol 2,4,6-Tribromophenol	Diluted Out	35 - 114 43 - 116 33 - 141 10 - 94 21 - 100 10 - 123	23 - 120 30 - 115 18 - 137 24 - 113 25 - 121 19 - 122

Burlington Environmental, Engineering

Project: 624878 Page 8 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-2

Client ID: CP-HA-12-6-6.5

TPH Per EPA Method 418.1 Date Extracted: 9-23-92 Date Analyzed: 9-24-92

Total Petroleum
Hydrocarbons, mg/kg

40,000

TPH Per EPA SW-846 Modified Method 8015

Date Extracted: 9-29-92 Date Analyzed: 9-30-92

Total Petroleum

Fuel Hydrocarbons, mg/kg 37,000

TPH as Aged Gas, Diesel, and Heavy Oil

SURROGATE RECOVERY, %

1-chlorooctane X8 o-terphenyl X8

Burlington Environmental, Engineering

Project: 624878 Page 9 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-3

Client ID: CP-HA-11-1.5-2

Semivolatile Organics Per EPA SW-846 Method 8270 Date Extracted: 9-23-92 Date Analyzed: 9-29-92

CAS No.	Compounds	Concentration ug/kg	PQL
108-95-2 111-44-4 95-57-8 541-73-1 106-46-7 100-51-6 95-50-1 95-48-7	Phenol bis(2-Chloroethyl) ether 2-Chlorophenol 1,3-Dichlorobenzene 1,4-Dichlorobenzene Benzyl Alcohol 1,2-Dichlorobenzene 2-Methylphenol	ND ND ND ND ND ND ND	72,000 72,000 72,000 72,000 72,000 140,000 72,000 72,000
39638-32-9 106-44-5 621-64-7 67-72-1 98-95-3 78-59-1 88-75-5 105-67-9 65-85-0			72,000 72,000 72,000 72,000 72,000 72,000 72,000 72,000 360,000
111-91-1 120-83-2 120-82-1 91-20-3 106-47-8 87-68-3 59-50-7	bis(2-Chloroethoxy)methane 2,4-Dichlorophenol 1,2,4-Trichlorobenzene Naphthalene 4-Chloroaniline Hexachlorobutadiene 4-Chloro-3-methylphenol	*(18,000) ND *(18,000) ND ND ND	72,000 72,000 72,000 72,000 140,000 72,000 140,000

ND - Not Detected

<sup>\*</sup> Compound was detected but below PQL. Value shown is an estimated quantity.

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Lab No. 27215-3

Client ID: CP-HA-11-1.5-2

CAS No. Compounds Concentration ug/kg  91-57-6 2-Methylnaphthalene 85,000 77-47-4 Hexachlorocyclopentadiene ND 88-06-2 2,4,6-Trichlorophenol ND 95-95-4 2,4,5-Trichlorophenol ND 91-58-7 2-Chloronaphthalene ND 88-74-4 2-Nitroaniline ND 131-11-3 Dimethyl phthalate ND 131-11-3 Dimethyl phthalate ND 208-96-8 Acenaphthylene ND 606-20-2 2,6-Dinitrotoluene ND 99-09-2 3-Nitroaniline ND 83-32-9 Acenaphthene	
77-47-4       Hexachlorocyclopentadiene       ND         88-06-2       2,4,6-Trichlorophenol       ND         95-95-4       2,4,5-Trichlorophenol       ND         91-58-7       2-Chloronaphthalene       ND         88-74-4       2-Nitroaniline       ND         131-11-3       Dimethyl phthalate       ND         208-96-8       Acenaphthylene       ND         606-20-2       2,6-Dinitrotoluene       ND         99-09-2       3-Nitroaniline       ND	PQL
51-28-5	72,000 72,000

ND - Not Detected

<sup>\*</sup> Compound was detected but below PQL. Value shown is an estimated quantity.

Burlington Environmental, Engineering

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Lab No. 27215-3

Client ID: CP-HA-11-1.5-2

EPA Method	8270 Continued		
CAS No.	Compounds	Concentration ug/kg	PQL
206-44-0 129-00-0 85-68-7 91-94-1 56-55-3 218-01-9 117-81-7 117-84-0 205-99-2 207-08-9 50-32-8 193-39-5 53-70-3 191-24-2	Fluoranthene Pyrene Butyl benzyl phthalate 3,3'-Dichlorobenzidine Benzo(a)anthracene Chrysene bis(2-ethylhexyl)phthalate Di-n-octyl phthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	ND *(21,000) ND	72,000 72,000 72,000 140,000 72,000 72,000 72,000 72,000 72,000 72,000 72,000 72,000 72,000

ND - Not Detected

PQL - Practical Quantitation Limit - These are the quantitation limits for this sample. This number is based on sample size, matrix and dilution required.

\*Compound was detected but below PQL. Value shown is an estimated quantity.

Results are reported on a dry weight basis.

Semi-Volatile Surrogates

Surrogate Compound	Percent	Control	Limits
	Recovery	Water	Soil
Nitrobenzene - d <sub>5</sub> 2-Fluorobiphenyl p-Terphenyl-d <sub>14</sub> Phenol-d <sub>6</sub> 2-Fluorophenol 2,4,6-Tribromophenol	Diluted Out	35 - 114 43 - 116 33 - 141 10 - 94 21 - 100 10 - 123	23 - 120 30 - 115 18 - 137 24 - 113 25 - 121 19 - 122

Burlington Environmental, Engineering

Project: 624878 Page 12 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-3 Client ID: CP-HA-11-1.5-2

TPH Per EPA Method 418.1 Date Extracted: 9-23-92 Date Analyzed: 9-24-92

Total Petroleum
Hydrocarbons, mg/kg

120,000

TPH Per EPA SW-846 Modified Method 8015

Date Extracted: 9-29-92 Date Analyzed: 9-30-92

Total Petroleum

Fuel Hydrocarbons, mg/kg 97,000 E

TPH as Aged Gas, Diesel, and Heavy Oil

SURROGATE RECOVERY, %

1-chlorooctane X8 o-terphenyl X8

Burlington Environmental, Engineering

Project: 624878 Page 13 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-4

Client ID: CP-HA-11-6-6.5

Semivolatile Organics Per EPA SW-846 Method 8270 Date Extracted: 9-23-92 Date Analyzed: 9-29-92

CAS No.	Compounds	Concentration ug/kg	PQL
108-95-2 111-44-4 95-57-8 541-73-1 106-46-7 100-51-6 95-50-1 95-48-7 39638-32-9 106-44-5	Phenol bis(2-Chloroethyl) ether 2-Chlorophenol 1,3-Dichlorobenzene 1,4-Dichlorobenzene Benzyl Alcohol 1,2-Dichlorobenzene 2-Methylphenol bis(2-Chloroisopropyl)ether 4-Methylphenol	ND ND ND ND ND ND ND ND ND	7,200 7,200 7,200 7,200 7,200 14,000 7,200 7,200 7,200 7,200
621-64-7 67-72-1 98-95-3 78-59-1 88-75-5 105-67-9 65-85-0 111-91-1 120-83-2 120-82-1 91-20-3 106-47-8 87-68-3 59-50-7	N-Nitroso-Di-N-propylamine Hexachloroethane Nitrobenzene Isophorone 2-Nitrophenol 2,4-Dimethylphenol Benzoic Acid bis(2-Chloroethoxy)methane 2,4-Dichlorophenol 1,2,4-Trichlorobenzene Naphthalene 4-Chloroaniline Hexachlorobutadiene 4-Chloro-3-methylphenol	ND ND ND ND ND ND ND ND ND ND ND ND ND	7,200 7,200 7,200 7,200 7,200 7,200 7,200 7,200 7,200 7,200 14,000 7,200 14,000

ND - Not Detected

<sup>\*</sup> Compound was detected but below PQL. Value shown is an estimated quantity.

Burlington Environmental, Engineering

Project: 624878 Page 14 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-4

Client ID: CP-HA-11-6-6.5

ND - Not Detected

<sup>\*</sup> Compound was detected but below PQL. Value shown is an estimated quantity.

Burlington Environmental, Engineering

Project: 624878 Page 15 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-4

Client ID: CP-HA-11-6-6.5

EPA Method 8270 Continued					
CAS No.	Compounds	Concentration ug/kg	PQL		
206-44-0 129-00-0 85-68-7 91-94-1 56-55-3 218-01-9 117-81-7 117-84-0 205-99-2 207-08-9 50-32-8 193-39-5 53-70-3 191-24-2	Fluoranthene Pyrene Butyl benzyl phthalate 3,3'-Dichlorobenzidine Benzo(a)anthracene Chrysene bis(2-ethylhexyl)phthalate Di-n-octyl phthalate Benzo(b)fluoranthene Benzo(k)fluoranthene Benzo(a)pyrene Indeno(1,2,3-cd)pyrene Dibenz(a,h)anthracene Benzo(g,h,i)perylene	ND *(2,200) ND	7,200 7,200 7,200 14,000 7,200 7,200 7,200 7,200 7,200 7,200 7,200 7,200 7,200		

ND - Not Detected

PQL - Practical Quantitation Limit - These are the quantitation limits for this sample. This number is based on sample size, matrix and dilution required.

\*Compound was detected but below PQL. Value shown is an estimated quantity.

Results are reported on a dry weight basis.

Semi-Volatile Surrogates

Surrogate Compound	Percent	Control	Limits
	Recovery	Water	Soil
Nitrobenzene - d <sub>5</sub> 2-Fluorobiphenyl p-Terphenyl-d <sub>14</sub> Phenol-d <sub>6</sub> 2-Fluorophenol 2,4,6-Tribromophenol	Diluted Out	35 - 114 43 - 116 33 - 141 10 - 94 21 - 100 10 - 123	23 - 120 30 - 115 18 - 137 24 - 113 25 - 121 19 - 122

Burlington Environmental, Engineering

Project: 624878 Page 16 of 16 Lab No. 27215 October 5, 1992

Lab No. 27215-4

Client ID: CP-HA-11-6-6.5

TPH Per EPA Method 418.1 Date Extracted: 9-23-92 Date Analyzed: 9-24-92

Total Petroleum Hydrocarbons, mg/kg

11,000

TPH Per EPA SW-846 Modified Method 8015

Date Extracted: 9-29-92 Date Analyzed: 9-30-92

Total Petroleum

Fuel Hydrocarbons, mg/kg

11,000

TPH as

Diesel and Heavy Oil

SURROGATE RECOVERY, %

1-chlorooctane o-terphenyl

**X8** 

X8

SOUND ANALYTICAL SERVICES

DENNIS L. BEAL